

Andrew C. Lauersdorf, WSBA #35418
E-mail: acl@mrllegaltteam.com
Janis C. Puracal, WSBA #39234
E-mail: jcp@mrllegaltteam.com
MALONEY LAUERSDORF REINER, PC
1111 E. Burnside St., Ste. 300
Portland, OR 97214
Telephone: (503) 245-1518
Facsimile: (503) 245-1417

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PERIENNE DE JARAY,

Plaintiff,

5

ATTORNEY GENERAL OF CANADA
FOR HER MAJESTY THE QUEEN,
CANADIAN BORDER SERVICES
AGENCY, GLOBAL AFFAIRS CANADA
fka DEPARTMENT OF FOREIGN
AFFAIRS AND INTERNATIONAL
TRADE CANADA, GEORGE WEBB,
KEVIN VARGA, and PATRICK LISKA.

Defendants.

No.: 2:16-cv-00571

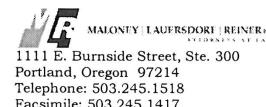
JOINT STIPULATION ON SERVICE
OF PROCESS AND THE
DEFENDANTS' DEADLINE TO
ANSWER THE COMPLAINT

STIPULATION

Plaintiff Perienne de Jaray (“Plaintiff”) and Defendants Attorney General of Canada for Her Majesty the Queen (“Attorney General”), Canadian Border Services Agency (“CBSA”), Global Affairs Canada fka Department of Foreign Affairs and International Trade Canada (“DFAIT”), George Webb, Kevin Varga, and Patrick Liska (collectively, “Defendants”) hereby stipulate and agree as follows:

1. Defendants George Webb and DFAIT were served as of the dates

Page 1- JOINT STIPULATION ON SERVICE OF PROCESS AND THE DEFENDANTS' DEADLINE TO ANSWER THE COMPLAINT



1 indicated on the affidavits of service on file with the court.

2 2. Defendants Attorney General, CBSA, Varga, and Liska authorize
3 their attorneys, Garvey Schubert Barer, to accept service on their behalf.

4 3. Service will be deemed to have taken place in Canada.

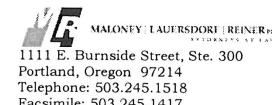
5 4. Service on all Defendants will be deemed to be proper and to have
6 taken place under The Hague Convention on the Service Abroad of Judicial and
7 Extrajudicial Documents in Civil or Commercial Matters pursuant to 28 U.S.C.
8 § 1608 of the Federal Sovereign Immunities Act (as to the government
9 defendants) and pursuant to Federal Rule of Civil Procedure 4(f) (as to the
10 individual defendants).

11 5. The time for all Defendants to respond to the complaint will be
12 extended to September 29, 2016. The Defendants will file answers or motions
13 that will be due on or before Thursday, September 29. Plaintiff's response to
14 any such motions will be due on or before Monday, October 17. Defendants'
15 reply to any such motions will be due on or before Friday, October 21. The
16 motions will be noted for consideration on Friday, October 21. The parties will
17 request oral argument, if any, to take place after October 28.

18 6. This joint stipulation regarding service and the deadline to answer
19 will not alter any other deadlines under the Federal Rules of Civil Procedure.
20 The parties will hold their FRCP 26(f) conference on or before August 2, and the
21 joint status report will be filed on or before August 16.

22 The parties agree that the purpose of this joint stipulation is to facilitate
23 proper service and permit the Defendants additional time to respond to the
24 complaint. The parties agree that the joint stipulation cannot be used for any
25 other purpose.

26
Page 2- JOINT STIPULATION ON SERVICE OF PROCESS AND THE
DEFENDANTS' DEADLINE TO ANSWER THE COMPLAINT



1 Dated this ____ day of _____, 2016.

2 MALONEY LAUERSDORF REINER, PC	3 GARVEY SCHUBERT BARER
4 By _____ 5 Andrew C. Lauersdorf, WSBA #35418 E-Mail: acl@mlrlegalteam.com 6 Janis C. Puracal, WSBA #39234 E-Mail: jcp@mlrlegalteam.com 7 Attorneys for Plaintiff Perienne de Jaray	By _____ David R. West, WSBA #13680 E-Mail: drwest@gsblaw.com Donald B. Scaramastra, WSBA #21416 E-Mail: dscaramastra@gsblaw.com Victoria Slade, WSBA #44597 E-Mail: vslade@gsblaw.com 9 Attorneys for Defendants

10

11 **ORDER**

12 It is so ordered.

13 Dated this ____ day of _____, 2016.

14

15

16

UNITED STATES DISTRICT JUDGE

17

18

19

20

21

22

23

24

25

26

Page 3- JOINT STIPULATION ON SERVICE OF PROCESS AND THE
DEFENDANTS' DEADLINE TO ANSWER THE COMPLAINT

